

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
ROY A. HENDRICKS : CHAPTER 13
Debtor. :

LAKEVIEW LOAN SERVICING, LLC :
Movant, :
 :
 :
vs. :
ROY A. HENDRICKS : CASE NO. 5-21-00169
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Roy A. Hendricks, the Debtor, and files an Answer to Lakeview Loan
Servicing's Motion for Relief From the Automatic Stay:

1. Roy A. Hendricks (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor applied for a homeowners assistance loan with PHFA. The loan was approved. The loan will bring the mortgage payments current.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to cure the arrears over a six (6) month period and/or include the arrears in an amended Chapter 13 Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: March 4, 2022

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 4, 2022, he caused a true and correct copy of Debtor's Answer to Lakeview Loan Servicing's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Brian C. Nicholas, Esq. at bnicholas@kmlawgroup.com

Dated: March 4, 2022

/s/Tullio DeLuca
Tullio DeLuca, Esquire